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REDACTED

Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PIROUZ SEDAGHATY,

Defendant.

CR 05-60008

DECLARATION OF WILLIAM
TEESDALE, CHIEF INVESTIGATOR,
FEDERAL PUBLIC DEFENDER'S
OFFICE

I, William Teesdale, declare:

mm

1. I am currently employed as the Chief Investigator for the Federal Public Defender for the District of Oregon. I am also a member of the bars of Oregon and England. I am one of the investigators assigned to work on Mr. Sedaghaty's case and have been assigned to work on that matter since approximately August 2007, when we were appointed to represent Mr. Sedaghaty.

2. As part of my investigation work on Mr. Sedaghaty's case, in April 2008, I met with Mr. Soliman Al Buthe in Riyadh, Saudi Arabia. This travel was official U.S. government travel and had been approved in advance by the State Department.

3. During my meetings with Mr. Al Buthe, he told me, amongst other things, that he has twice been interviewed by representatives of the government of Saudi Arabia, and provided them a complete statement regarding his work for the Al Haramain organization, including concerning the money he collected from the United States that was deposited into Al Haramain International account, for which he was provided two receipts. During my meetings with Mr. Al Buthe, he provided me with copies of the two receipts and showed me the originals. Mr. Al Buthe told me that some years previously, although he could not recall the exact years, the government of Saudi Arabia seized the Al Haramain building in Riyadh and took all of the documents.

4. Mr. Al Buthe told me that he provided the government of Saudi Arabia receipts showing the deposit of over five million Saudi Rials into the account of the Saudi Joint Relief Committee by the Al Haramain organization. Mr. Al Buthe also told me that the Al Haramain offices in Chechnya operated under the supervision of the Saudi Joint Relief Committee (SJRC) and that he provided a number of documents to me, which are also in

the possession of the government of Saudi Arabia, showing the high level links between Al Haramain and high Saudi government officials and documenting the control exercised by the SJRC over expenditure of charitable funds expended by Saudi Arabian charities in Chechnya during the relevant time frame.

5. Mr. Al Buthe told me that the Al Haramain organization was very closely linked to the Saudi government, and that the current minister of Islamic Affairs was the Chairman of the Al Haramain board.

6. In 2009, I was informed by Thomas Nelson, attorney for Mr. Al Buthe, that Aqeel al Aqeel, Mansour Al Kadi, and Sami Al Sanad, all of whom are former Al Haramain officials, are in custody in Saudi Arabia. Mr. Al Aqeel and Mr. Al Kadi are former board members of Al Haramain Ashland.

7.

My understanding from conversations with Mr. Al Buthe is that this information was provided by Mr. Al Buthe to Saudi authorities, and as stated above in paragraph 3, should be consistent with his statement to me that he was not aware that had to file a CMIR report

on leaving the United States, because he was not given any form or notice, that he had to do so. Mr. Al Buthe told me that he had filed many such reports upon entering the United States when he has travelers checks over \$10,000.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 27th day of April, 2010.



William Teesdale

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